

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Pennsylvania

United States of America  
v.

CAMERON STYLES

Case No. 22-MJ-296

\_\_\_\_\_  
*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 10, 2022 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

*Offense Description*

18 USC 2119  
18 USC 924(c)

Carjacking  
Carrying, using, and brandishing a firearm during the commission of a crime of violence

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.

/s Charles Ramsey

*Complainant's signature*

Special Agent Charles Ramsey, ATF

*Printed name and title*

Sworn to before me and signed in my presence.

Date: Feb. 28, 2022

/s/ Elizabeth T. Hey

*Judge's signature*

City and state: Philadelphia, PA

Hon. Elizabeth T. Hey, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Charles Ramsey, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I, Charles Ramsey, am a Special Agent with ATF, and have been so employed since August 2016. I am currently assigned to ATF Philadelphia Group VII, which is a Firearms Enforcement Group whose primary responsibilities include investigating violent crime through the interdiction of firearms being possessed by violent criminals in Philadelphia, Pennsylvania. I have successfully completed the Criminal Investigator Training program (CITP) as well as the Special Agent Basic Training program (SABT). Prior to becoming a Special Agent, I was a Philadelphia Police Officer for three years. As a result of my training and experience, and that of my fellow investigators, I am familiar with investigations involving violations of federal firearms laws, and I am familiar with federal search warrants and searching for and seizing evidence in accordance with the probable cause set forth in supporting affidavits. Throughout my training as a Special Agent with the ATF, I was trained to conduct physical surveillance, interview sources of information and defendants, serve and review telephone subpoenas, serve search warrants and arrest warrants, investigate firearms trafficking, National Firearms Act (NFA) violations, Hobbs Act violations, undercover firearms and narcotic investigations, and the interception of wire communications. Further, I have been trained to testify in judicial proceedings in federal court involving prosecutions relating to violations of federal firearms laws. I routinely refer to and utilize these laws and regulations during the course of my official duties. As a result of my training and experience, and the experience of other agents, I am familiar with evidence in a criminal complaint affidavit to establish probable cause.

2. The information contained in this affidavit is known to me personally or has been relayed to me by other law enforcement officers or is based upon my review of law enforcement reports and other documents. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause to secure authorization to arrest Cameron STYLES, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

3. Based on the facts set forth below, I submit there is probable cause to believe that Cameron STYLES, along with Jamie MANEELY,<sup>1</sup> committed the crime of taking a motor vehicle that has been transported, shipped, or received in interstate commerce from a person by force and violence and by intimidation, and aiding and abetting, in violation of Title 18, United States Code, Sections 2119 (carjacking) and 2, and the crime of carrying, using, and brandishing a firearm during and in relation to a crime of violence, in violation of Title 18, United States Code, Section 924(c).

### **PROBABLE CAUSE**

#### **A. Carjacking of Victim #1 on February 10, 2022**

4. On February 10, 2022, Victim #1 was carjacked at gunpoint by two males at 299 Byberry Road, Philadelphia, PA 19116. Taken was Victim #1's gray 2017 Toyota Highlander, PA tag GLE1804 (VIN: 5TDBZRFH4HS429053). Victim #1<sup>2</sup> later stated to police that he was parked at the Forrest Hill train station when he was approached by two males, one was

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<sup>1</sup> Jamie MANEELY is charged separately in a criminal complaint with the Hobbs Act robbery offense set forth in paragraph 6-8 of this affidavit, docketed at 22-MJ-297.

<sup>2</sup> Victim #1 is a person who is known to law enforcement and has been interviewed. Victim #1 is believed to be truthful and credible as his/her information has been independently corroborated by this investigation. Victim #1 provided information to the police as a victim to a crime and is not providing information for, or with the expectation of, receiving financial or judicial consideration.

approximately 5'9" to 5'10" and one was about 6'2". Victim #1 stated that the shorter male pointed a black firearm at him and stated, "Give me your car keys and wallet." Victim #1 provided his keys and wallet to the male who possessed the firearm and the two males drove off in Victim #1's vehicle.

### **B. Carjacking of Victim #2 on February 11, 2022**

5. On February 11, 2022, Victim #2 was carjacked while in his white 2020 Kia Soul bearing PA tag 90677PD (VIN: KNDJ23AAU8L7092049). Victim #2<sup>3</sup> later stated to police that he was parked at a Sonoco gas station located at 7241 Torresdale Avenue, Philadelphia, PA. Victim #2 stated that he was approached by two males exiting a dark colored Audi. One of the males pointed a handgun with a laser attachment at him and stated, "Get out of the car and give me the keys or I'll blow your head off." Victim #2 also stated that the male with the firearm told him that if the cops come, he'll shoot him and the cops. Victim #2 stated that he exited the car and the male with the firearm took his keys. The male with the firearm fled in Victim #2's vehicle and the other male fled in the Audi. Approximately two hours later, Victim #2's vehicle was recovered, unoccupied, at the scene of an accident at 9600 Northeast Avenue, Philadelphia, PA.

### **C. Commercial Robbery of Victim #3 on February 10, 2022**

6. On February 10, 2022, Victim #3 was working as a cashier at a Lukoil gas station located at 12001 East Roosevelt Boulevard, Philadelphia, PA. Victim #3<sup>4</sup> later stated to police

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<sup>3</sup> Victim #2 is a person who is known to law enforcement and has been interviewed. Victim #2 is believed to be truthful and credible as his/her information has been independently corroborated by this investigation. Victim #2 provided information to the police as a victim to a crime and is not providing information for, or with the expectation of, receiving financial or judicial consideration.

<sup>4</sup> Victim #3 is a person who is known to law enforcement and has been interviewed. Victim #3 is believed to be truthful and credible as his/her information has been independently corroborated

that an unknown white male, later identified as Jamie MANEELY, entered the store, approached the counter, told the clerk that he needed a minute to think, and then announced a robbery, while pointing a gun at Victim #3. When another customer walked into the store, MANEELY left the counter area. Once that customer left the store, MANEELY walked towards the counter and told the clerk that he wanted the money in the register. The victim then threw an envelope containing \$348 at MANEELY but the envelope landed on the floor. MANEELY then picked up the envelope and fled the store in an unknown direction.

7. PPD recovered surveillance video from the location. Video of the incident was shown to two Police Officers, who identified the suspect as Jamie MANEELY. Both officers had recent prior contact with MANEELY. In the video, MANEELY was wearing a black hooded sweatshirt with “Becker Enterprise Group” printed on the front.

8. A photo array was prepared by PPD containing MANEELY and five additional, similar photos of other males. The photo array was shown to Victim #3, who positively identified MANEELY as the male who robbed the gas station on February 10, 2022, and Victim #3 stated, “100% him.”

#### **D. Arrest of MANEELY and STYLES on February 11, 2022**

9. On February 11, 2022, at approximately 8:30 a.m., PPD responded to an auto accident involving a Toyota Highlander at 2200 Grant Avenue, Philadelphia, PA. Upon arrival, police observed MANEELY and STYLES still on location. STYLES was restrained by witnesses at the scene. One witness stated that they observed STYLES armed with a firearm while attempting to flee the scene of the accident on foot. Officers recovered, from STYLES, a

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by this investigation. Victim #3 provided information to the police as a victim to a crime and is not providing information for, or with the expectation of, receiving financial or judicial consideration.

black 9mm Privately Made Firearm (PMF) with a laser attachment, with no serial number, loaded with 10 rounds of 9mm ammunition and an additional magazine loaded with 19 rounds of 9mm ammunition. Witnesses stated to PPD that after the car accident, MANEELY was observed exiting the passenger side of the Toyota Highlander, and STYLES was observed exiting the driver side of the Toyota Highlander.

10. Victim #1 was brought to the scene of the auto accident and positively identified the gray Toyota Highlander operated by STYLES as his vehicle that was carjacked on February 10, 2022. Victim #1 also positively identified STYLES as the male armed with a black firearm during the carjacking on February 10, 2022, and MANEELY as the second male present during the robbery. The Toyota Highlander was affixed with a temporary Delaware paper tag XD304787 at the scene of the accident. Police confirmed that the Toyota belonged to Victim #1 after a query of the VIN.

11. Police also recovered surveillance video of the robbery of Victim #2 from 7141 Torresdale Avenue, Philadelphia, PA. Officers observed the surveillance video and positively identified MANEELY and STYLES as they approached Victim #2 to commit the robbery. In the surveillance video, MANEELY was wearing a black hooded sweatshirt with "Becker Enterprise Group" printed on the front. During the police's contact with MANEELY at the scene of the auto accident, MANEELY was wearing the same black hooded sweatshirt.

12. Following their arrest on February 12, 2022, officers showed separate photo arrays including SYTLES and MANEELY to the complaining witness in the carjacking that occurred at 7141 Torresdale Avenue. The complaining witness was not able to identify either suspect.

13. Later, police obtained a state search and seizure warrant for the Toyota Highlander and a bank card in the name of Jamie MANEELY was recovered from the Toyota Highlander.

14. Police also obtained a state search and seizure warrant for MANEELY's residence located at 8210 Pine Road, Apt. C2, Philadelphia, PA. During the execution of that search warrant, officers recovered 15 rounds of 9mm ammunition.

15. At all relevant times, the 2017 Toyota Highlander, (VIN: 5TDBZRFH4HS429053), was not manufactured in Pennsylvania, and therefore had to travel in interstate commerce to be in Pennsylvania on or about February 10, 2022.

**Conclusion**

16. Based on the above information, and my experience and training as an ATF special agent, I believe there is probable cause to arrest Cameron STYLES for using or carrying a firearm during and in relation to a crime of violence, and aiding and abetting, in violation of Title 18, United States Code, Sections 924(c) and 2, and taking a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from the person or presence of another by force and violence or by intimidation, and aiding and abetting, in violation of Title 18, United States Code, Sections 2119 and 2.

Respectfully submitted,

/s Charles Ramsey \_\_\_\_\_  
Charles Ramsey  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Subscribed and sworn to before me  
on February 28th, 2022.

/s/ Elizabeth T. Hey \_\_\_\_\_  
Hon. Elizabeth T. Hey  
United States Magistrate Judge



Attachment “A”

Count One

On or about February 10, 2022, in Philadelphia, in the Eastern District of Pennsylvania, defendant Cameron Styles, with intent to cause death and serious bodily harm, took from the person and presence of Victim #1, and aided and abetting the taking, by force and violence, and by intimidation, a motor vehicle, that is, a 2017 Toyota Highlander, VIN 5TDBZRFH4HS429053, license plate PA GLE-1804, that had been transported, shipped, and received in interstate commerce. In violation of Title 18, United States Code, Sections 2119 and 2.

Count Two

On or about February 10, 2022, in Philadelphia, in the Eastern District of Pennsylvania, defendant Cameron Styles knowingly used and carried, and aided and abetted the knowing use and carrying of, a firearm that is, a black 9mm semi-automatic privately manufactured firearm handgun, loaded with ten live rounds of 9mm ammunition, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count One of this complaint, and that firearm was brandished. In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.